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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA FLORIDA

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

Case No. 8:03-CR-77-T-30TBM

HATIM NAJI FARIZ

**UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE
TO ALLOW TRAVEL TO AND FROM THE CHICAGO, ILLINOIS AREA**

The Defendant, Hatim Naji Fariz, pursuant to 18 U.S.C. § 3142(c)(3), requests that this Honorable Court amend his conditions of release to allow him to travel to and from the area of Chicago, Illinois, and as good grounds therefor would show:

1. On April 23, 2003, Mr. Fariz was released on a substantial secured bond, which includes agreements to forfeit property. One of the conditions of Mr. Fariz's release is that he not travel outside the Middle District of Florida.

2. The trial in this case is scheduled to commence in January 2005. During the pendency of this case, Mr. Fariz would like to be able to travel to and from the area of Chicago, Illinois. Mr. Fariz makes this request so that he may be with his mother and other family members in the Chicago area, especially in light of his mother's health problems¹ and during religious holidays.

¹ This Court had previously granted Mr. Fariz's request to travel to Illinois, and his amended emergency request to travel to Illinois due to his mother's medical situation. Docs. 209, 225.

326

3. Prior to departing from the Middle District of Florida on any trips to the Chicago area, Mr. Fariz would provide notice to Fred David, Pretrial Services Officer, of his dates of travel and of his contact information. During his trips to Illinois, Mr. Fariz anticipates staying with his parents at 6509 West 81st Place, Burbank, Illinois 60459. Mr. Fariz would be able to be contacted at 708-430-1606. Should this information change, Mr. Fariz will provide prior notice to Mr. David. The undersigned counsel has spoken to Mr. David, and he indicated that he does not have an objection to this request.

4. The undersigned counsel has also spoken with Assistant United States Attorney Terry Zitek to advise him of this motion, and Mr. Zitek indicated that he is not opposed to this request.

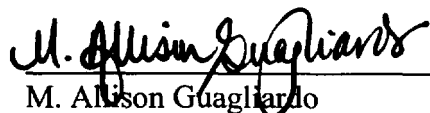
MEMORANDUM

The judicial officer may at any time amend an order of release to impose additional or different conditions of release. 18 U.S.C. § 3142(c)(3). Mr. Fariz respectfully requests that his conditions of pretrial release be amended to allow travel to and from the area of Chicago, Illinois, during the pendency of this case. The trial in this case will not commence until January 2005. The present motion will avoid the submission of multiple requests for permission to travel over the next fifteen months. Moreover, Mr. Fariz will provide prior notice to Pretrial Services of his travel dates and contact information.

WHEREFORE, the defendant, Hatim Naji Fariz, moves this Honorable Court for an order modifying his conditions of release to allow him to travel to and from the area of Chicago, Illinois, during the pendency of this case.

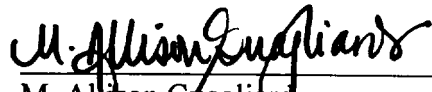
Respectfully submitted,

R. FLETCHER PEACOCK
FEDERAL PUBLIC DEFENDER


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Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of October, 2003, a true and correct copy of the foregoing was hand delivered to Terry Zitek, Assistant United States Attorney, 400 North Tampa Street, Suite 3200, Tampa, Florida 33602 and to Fred David, Pretrial Services Officer, 500 Zack Street, Tampa, Florida 33602.



M. Allison Guagliardo
Assistant Federal Public Defender